

The Law Office of
Rehan Nazrali, Esq.

229 Broadway • 17th Floor • New York • NY 10007 • Tel: (646) 331-9378 • Fax: (646) 572-8768
rnazraliesq@gmail.com

BY ECF

Hon. Sarah L. Cave
United States Magistrate
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007

Plaintiff's request for a discovery conference (ECF No. 83) is DENIED WITHOUT PREJUDICE as premature. Plaintiff may renew his request, if necessary, after Officer Wiedlein's deposition.

The Clerk of Court is respectfully directed to close ECF No. 83.

SO ORDERED 1/19/2022


SARAH L. CAVE
United States Magistrate Judge

Re: Nkansah v. United States
Civ. No.:18-CV-10230 (PAC) (SLC)

Dear Honorable Judge Cave:

The undersigned represents Plaintiff in the above-referenced action. Up until now Defense counsel and I have been able to cooperate regarding discovery. At present however, despite Plaintiff's prior repeated requests, Defense Counsel who had previously asserted that form G-391¹ was not applicable to this matter (transportation of detainee rules & regulations), just today advised me that the Government would turn over form G-391 but that they do not have it or cannot find it (they have also asserted the same for form I-794, his medical file). Given this 11th hour declaration on the eve of Plaintiff's deposition of Defense Counsel's witness, Supervisory Officer Thomas Weidlein, deposition tomorrow at 10am, Plaintiff shall proceed with the deposition but reserves his right to request a conference immediately upon completion of same to make a motion to compel such disclosure and or the right to recall this witness if the government should find both forms G-391 and I-794.

Respectfully,

/S/

Rehan Nazrali Esq

cc: (via ECF) Carly Wienreb, Counsel for Defendant

¹Form G-391 provide's as per ICE Transportation Standards III(B), information about any risks and dangers and necessary precautions transporting ICE officers must take respecting such detainee. This information is relevant and germane to this matter as Plaintiff was put into 5 point restraints and according to relevant policy guidelines such restraints should only be used where such detainee poses a security risk to transporting ICE officers